

Georgianna W. Oliver

Tulsa, OK 74114

**FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL**

2008 NOV 13 P 2:39

**Mr. Jeff S. Jordan
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
Washington, D.C. 20463**

RE: Response to MUR 6102

Dear Mr. Jordan:

In response to the complaint filed by Shane M. Saunders, a legislative assistant to my opponent Rep. John Sullivan from 2002 through 2006, I hereby certify as follows:

Response to alleged Violation #1. All funds loaned to the Oliver Committee were loaned from "personal funds" as defined in 11 CFR 100.33. These personal funds came from distributions which were made to me personally from the following sources:

- 1) The IRA Accounts listed on Schedule II of the United States House of Representatives Financial Disclosure Statement;**
- 2) Distributions made to me personally as sole shareholder of EverGreen Solutions, Inc., in accordance with the EverGreen Solutions, Inc. bylaws (EverGreen Solutions, Inc. is listed as an asset on Schedule II of the United States House of Representatives Financial Disclosure Statement); and**
- 3) Income derived from employment (salary) with EverGreen Solutions, Inc. (which is disclosed on Schedule I of the United States House of Representatives Financial Disclosure Statement).**

All of these loans were detailed as required by law in Schedule C to FEC Form 3. Newspaper articles, which were corrected multiple times (including a correction which was not included in Mr. Saunders' complaint), are not evidence of violations of FEC Rules or Regulations and the complaint clearly fails to provide any evidence of any such violations.

All funds from the sale of the assets of AptBudget were paid to AptBudget. AptBudget owed debt to EverGreen Solutions, which debt was paid upon the sale of the AptBudget assets. The amount owed to EverGreen by AptBudget was greater than the amount of the proceeds from the sale of AptBudget's assets. The value of AptBudget's assets were included in the value of EverGreen Solutions, Inc. as reported on Schedule II of the United States House of Representatives Financial Disclosure Statement by virtue of the receivable owed by AptBudget to EverGreen Solutions, Inc., which receivable was greater than the amount received by AptBudget when AptBudget sold its assets.

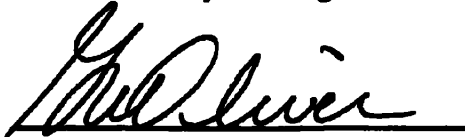
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Response to alleged Violation #2. In response to this alleged violation, there is one entry on Schedule B of my United States House of Representatives Disclosure Statement that lists the purpose as only "Reimbursements". The amount is for \$840 and this was for travel expenses (airfare, transportation and lodging) for a person who provided volunteer services to the campaign. There are no entries on Exhibit D related to "get-out-the-vote" or "voter registration" as is alleged in the written complaint.

Conclusion. Given the fact that Mr. Saunders has not provided any evidence of any violation of FEC Rules or Regulations and given that all submissions by me on the United States House of Representatives Financial Disclosure Statement are in compliance with FEC Rules and Regulations, except as detailed herein and as will be corrected by my campaign committee, no action should be taken by the FEC against me or the Oliver for US Congress campaign committee.

AFFIDAVIT

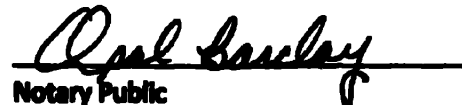
I hereby swear upon penalty of perjury that the above and foregoing responses and the information set forth in this response is true and correct to the best of my knowledge and belief.


Georgianna W. Oliver

Sworn and subscribed before me this 12th day of November, 2008.

NOTARY SEAL




Notary Public

My Commission Expires: 01/28/09

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